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## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MICHAEL BRUCE individually and on behalf of all others similarly situated,

Plaintiff,

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SELLEN CONSTRUCTION CO., INC., a Washington corporation,

Defendant.

Case No. 2:25-cv-00705-JHC

STIPULATED MOTION AND ORDER TO STAY PENDING DEADLINES

Pursuant to Local Civil Rules 7(d)(1) and 10(g), the parties, by and through their counsel of record, hereby stipulate and jointly move this Court for a stay of the case deadlines set forth in this Court's Order Regarding Initial Disclosures, Joint Status Report and Early Settlement (Dkt. No. 12), pending a decision on Plaintiff's Motion to Remand (Dkt. No. 14). Good cause supports a stay of the current case deadlines, where Defendant removed this matter to this Court, and Plaintiff thereafter moved to remand. The parties agree that the Court should determine jurisdiction before further deadlines of the Court proceed.

Accordingly, the parties respectfully request that the Court stay the deadlines for a FRCP 26(f) Conference, Initial Disclosures, and a Combined Joint Status Report and Discovery Plan, pending this Court's decision on Plaintiff's pending Motion to Remand.

1 DATED: May 29, 2025. 2 BALLARD SPAHR LLP 3 4 By: s/Erin M. Wilson 5 Erin M. Wilson, WSBA No. 42454 Alayna Piwonski, WSBA No. 57960 6 1420 Fifth Ave No. 4200 Seattle, WA 98101 7 Tel: 206.223.7000 wilsonem@ballardspahr.com 8 piwonskia@ballardspahr.com 9 Attorneys for Defendant Sellen Construction Co., Inc. 10 JUSTICE LAW CORPORATION 11 12 By s/Dean Petitta 13 Douglas Han, WSBA 59429 Shunt Tatavos-Gharajeh, WSBA 59424 14 Dean Petitta, WSBA 58295 751 North Fair Oaks Ave Suite 101 15 Pasadena CA 91103 Tel: 818.230.7502 16 dhan@justicelawcorp.com 17 statavos@justicelawcorp.com dpetitta@justicelawcorp.com 18 Attorneys for Plaintiff 19 20 **ORDER** 21 BASED ON THE FOREGOING STIPULATION, 22 IT IS SO ORDERED. 23 DATED this 29th day of May, 2025. 24 25 John H. Chun 26 United States District Judge 27

STIPULATED MOTION TO STAY DEADLINES - 2 Case No. 2:25-cv-00705-JHC